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August 20, 2002
Ref. No.: GA02-045

Jeffrey Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh St., S.W.
Washington, D.C. 20590

**Re: Docket No. NHTSA-2002-12231, Federal Motor Vehicle Theft Prevention
Standard Notice of Proposed Rulemaking: Parts Marking**

Dear Dr. Runge,

Subaru of America, Inc. ("Subaru"), the distributor for Subaru vehicles in the United States, on behalf of Fuji Heavy Industries Ltd. ("FHI") and Subaru-Isuzu Automotive Inc. ("SIA") the manufacturers of Subaru vehicles, submits the following comments in response to the Notice of Proposed Rulemaking (NPRM) to establish extended parts marking requirements to all passenger cars and multipurpose vehicles. Subaru is pleased to have this opportunity to provide its comments to NHTSA on this Proposal [Federal Register/Vol. 67, No. 123/June 26, 2002, pages 43075-43087].

Currently, the Forester and Legacy are required to have parts marked. Since the Forester is assembled in Japan by FHI and the Legacy in the U.S. by SIA, we have equipment in place to mark current Part 541 components. However, addition of the Impreza carline under the Proposal would require purchase of additional equipment and new per car costs to print and apply the VIN labels.

"More Permanent Marking Methods"

In particular, Subaru wishes to comment on the suggestion that the VIN be stamped into the component. FHI and SIA already stamp the VIN, or a derivative, into the engine bulkhead of their vehicles. Subaru has no knowledge of any current stamping technology which would apply a permanent marking in metal body panels themselves without damaging the panels.

With regard to components such as engines and transmissions, additional assembly line side metal stamping would be costly due to the need for specialized additional manpower and equipment. Non-line side metal stamping creates extraordinary sequencing complications in coordinating marked parts with their respective vehicles. In particular, difficulties would arise when a pre-marked part was scrapped at the assembly line for any reason. The cost of production downtime and/or off-line retrofitting associated with replacement parts would drive the costs well above \$24.86 per vehicle.

Subaru does not know of any more permanent marking method that could be accomplished at a reasonable cost. Moreover, Subaru is not certain the technology exists to create a true “permanent mark” that could not be revoked in some fashion by a determined thief.

“Marking Air Bags and Window Glazing”

Subaru opposes marking of glazing and air bag modules for the same vehicle manufacturer reasons cited in the NPRM. Permanent marking of glazing and air bags would result in high costs and parts sequencing complications when performed off-line.

Although line side etching of laminate glazing is possible, such a requirement would burden manufacturers with the need for additional costly equipment and increased staffing needs. Also, Subaru questions the feasibility of etching heat-tempered glass on the assembly line due to the high risk of breakage and the resulting scrap costs and possible injuries. Non-line side etching of glazing would result in the same sequencing difficulties as discussed previously.

Currently, vendor-supplied air bag modules do not require any further Subaru assembly prior to installation. Mandating that air bag modules be stamped would force manufacturers to develop line side stamping operations or to sequence pre-marked air bag modules. Sequencing difficulties have already been discussed above. Line-side stamping would undoubtedly increase the risk of injury resulting from accidental deployment. To avoid such risks, manufacturers would have to implement air bag sub-assembly lines and incorporate a module stamping operation. However, such activities would drastically increase vehicle manufacturing costs and decrease the assembly process efficiency.

In summary, Subaru believes that NHTSA should not go beyond the parts marking requirements obligated in the 1992 Theft Act. Subaru also believes that standard antitheft devices are at least as effective as parts marking in preventing theft and that NHTSA should continue to make exemptions available in such cases.

Page 3

We appreciate the opportunity to provide the above comments. If there are any questions, please contact myself at (856) 488-8644 or Gerald Plante at (856) 488-3226.

Sincerely,

Don Bearden
Director, Governmental Affairs

cc: Ms. Deborah Mazyck, Office of Planning and Consumer Programs, NHTSA
Docket Management, Room PL-401, NHTSA, 400 Seventh St. SW, Washington,
DC 20590 (2 copies enclosed plus electronic submission)